

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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ILUMINADA ORTEGA,

Plaintiff,

v.

CHAMPAGNE ROOM BK, INC d/b/a DRAFT
BARN d/b/a END ZONE SPORTS BAR &
LOUNGE, RUBEN YEGHOYAN, and SARKIS
AVOYANTS,

Defendants.
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Case No.: 1:21-cv-1125 (HG) (CLP)

**PLAINTIFF'S NOTICE OF
MOTION FOR DEFAULT
JUDGMENT AGAINST
DEFENDANT SARKIS AVOYANTS**

PLEASE TAKE NOTICE THAT, upon the annexed declaration of Emanuel Kataev, Esq., and accompanying exhibits, and the affidavit of Plaintiff ILUMINADA ORTEGA, and all prior papers and proceedings in this case, the Plaintiff, by her undersigned counsel, will move this Court, on such date as is set by the Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 55.2(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for judgment by default against Defendant SARKIS AVOYANTS (hereinafter "Defendant").

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), answering papers, if any, shall be served on the undersigned no later than Monday, May 12, 2025, and Plaintiff shall file reply papers in further support no later than Monday, May 19, 2025.

Dated: Jamaica, New York
April 26, 2025

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.com

Attorneys for Plaintiff
Illuminada Ortega